

1 PHILLIP A. TALBERT
United States Attorney
2 PETER THOMPSON, HI 5890
Acting Regional Chief Counsel
3 ELIZABETH LANDGRAF, CA 313184
Special Assistant United States Attorney
4 Social Security Administration
160 Spear Street, Suite 800
5 San Francisco, CA 94105
Telephone: (510) 970-4828
6 Facsimile: (415) 744-0134
Elizabeth.Landgraf@ssa.gov
7 Attorneys for Defendant

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9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 FRESNO DIVISION

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13 SUSAN CHRISTINE RUSSELL,
14 Plaintiff,
15 v.
16 KILOLO KIJAKAZI,
17 Acting Commissioner of Social Security,
18 Defendant.

No. 2:21-cv-01595-CKD

STIPULATION AND ORDER FOR EXTENSION
OF TIME TO FILE DEFENDANT'S
OPPOSITION TO PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT

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21 The parties stipulate through counsel that Defendant, the Acting Commissioner of Social
22 Security (the "Commissioner"), shall have a 60-day extension of time to respond to Plaintiff's
23 Motion for Summary Judgment ("Motion") (Dkt. No. 15), extending the date on which
24 Defendant's response is due from September 1, 2022, to October 31, 2022.

25 Defendant needs more time to respond to Plaintiff's Motion because the undersigned
26 attorney was recently reassigned to this case and needs more time review the record, evaluate the
27 issues raised in Plaintiff's Motion, determine whether options exist for settlement, and if not,
28 prepare Defendant's Opposition to Plaintiff's Motion. In addition, the undersigned attorney for

Defendant currently has 11 district court briefs due during the month of September, in addition to other litigation deadlines.

Due to the overall volume of work within the Commissioner's Region IX Office of General Counsel, neither the undersigned attorney nor another attorney in the Region IX Office anticipate being able to review and respond to Plaintiff's Motion by the current due date. Current staffing limitations caused by planned and unplanned leave of multiple attorneys make immediate reassignment impractical. Accordingly, the Commissioner respectfully requests an extension of 60 days, until October 31, 2022, to respond to Plaintiff's Motion.

This request is made in good faith and is not intended to delay the proceedings in this matter.

Respectfully submitted,

DATE: August 12, 2022

/s/ Jacqueline Anna Forslund
JACQUELINE ANNA FORSLUND
Attorney for Plaintiff
(as approved via email)

PHILLIP A. TALBERT
United States Attorney
PETER THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

DATE: August 12, 2022

By /s/ Elizabeth Landgraf
ELIZABETH LANDGRAF
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including October 31, 2022, to respond to Plaintiff's Motion for Summary Judgment.

Dated: August 15, 2022


CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE